

John A. Kawai, CSBN 260120
CARPENTER, ZUCKERMAN & ROWLEY
407 Bryant Circle, Suite F,
Ojai, CA 93023
Tel: (805) 272-4001
Fax: (805) 719-6858
Email: team3@czrlaw.com
Of Attorneys for Plaintiffs

Deborah A. Bianco, *Pro Hac Vice*
14535 Bel-Red Road, #201
Bellevue, WA 98007
(425) 747-4500
Email: deb@debbiancolaw.com
Attorney for Plaintiffs Maureen, Pia,
And Mya

Carol L. Hepburn, *Pro Hac Vice*
200 First Avenue West, #550
Seattle, WA 98119
Tel: (206) 957-7272
Fax: (206) 957-7273
Email: carol@hepburnlaw.net
Attorney for Plaintiffs Lily, Sarah,
Skylar, Savannah, Sally, Sierra, Violet,
Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

NO. 19 CV 2184 PJH

“AMY,” “ERIKA,” JANE SMITH as next of
friend for “TORI” minor, “JENNY,”
“JESSICA,” “LILY,” “SARAH,” JANE DOE
as court appointed conservator for “SKYLAR”
and “SAVANNAH” minors, JOHN DOE as
court appointed conservator for “SALLY” and
“SIERRA” minors, “MAUREEN,” WILLIAM
L.E. DUSSAULT as Guardian ad Litem for
“VIOLET” minor, and JANE ROE as next
friend for “PIA,” and “MYA,”

Plaintiffs,

CORRECTED DECLARATION OF
CAROL L. HEPBURN IN SUPPORT OF
RESPONSE TO DEFENDANT’S MOTION
TO DISMISS FOR FAILURE TO STATE A
CLAIM ON WHICH RELIEF CAN BE
GRANTED

NOTE ON MOTION CALENDAR:
Date: August 28, 2019
Time: 9:00 a.m.
Judge: Honorable Phyllis J. Hamilton
Chief United States District Judge

1 v.

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3 RANDALL STEVEN CURTIS,

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5 Defendant.

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10 CAROL L. HEPBURN hereby declares the following to be true and correct under the
11 laws of the State of Washington:

12 1. I am an attorney licensed to practice law in the States of Washington and
13 Oregon.

14 2. I represent the Plaintiffs herein. I make this Declaration in support of Response
15 To Defendant's Motion To Dismiss For Failure To State A Claim On Which Relief Can Be
16 Granted.

17 3. Attached hereto as Exhibit 1 is a true and correct copy of the Transcript of
18 Proceedings of guilty plea hearing in *United States v. Randall Steven Curtis*, United States
19 District Court, Northern District of California, No. 3:16-cr-00510-SI.

20 4. Attached hereto as Exhibit 2 is a true and correct copy of the Victim Notification
21 System notification which I received on behalf of the victims Lily, Sarah, Sierra, Skylar,
22 Violet, Sally, Savannah, Maureen, Pia and Mya from the United States Department of Justice
23 regarding Randall Steven Curtis. Their legal names are redacted to preserve their anonymity.
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CORRECTED DECLARATION OF CAROL L.
HEPBURN IN SUPPORT OF RESPONSE TO
DEFENDANT'S MOTION TO DISMISS- 2

1 5. Attached hereto as Exhibit 3 is a true and correct copy of the July 6, 2018
2 Stipulation Regarding Restitution to Claimants Other Than “CC” filed at ECF 90 in *United*
3 *States v. Randall Steven Curtis*, United States District Court, Northern District of California,
4 No. 3:16-cr-00510-SI.

5 6. Attached hereto as Exhibit 4 is a true and correct copy of the Amended
6 Judgment filed at ECF 114 in *United States v. Randall Steven Curtis*, United States District
7 Court, Northern District of California, No. 3:16-cr-00510-SI.

8 7. Attached hereto as Exhibit 5 is a true and correct copy of the Amy, Vicky and
9 Andy Child Pornography Victim Assistance Act of 2018, as retrieved from congress.gov
10 today.
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13 DATED this 28th day of August, 2019 at Seattle, WA.

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15 s/Carol L. Hepburn
16 CAROL L. HEPBURN
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